



THE CITY OF NEW YORK
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March 10, 2021

VIA ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Tracy Jones o/b/o her minor son, M.J. v. City of New York et al.
1:20-CV-4411 (PGG)

Your Honor:

I am a Senior Counsel assigned to the defense of the above-referenced matter. Defendant City writes with the consent of counsel for plaintiff, Alexis Padilla, Esq., to respectfully request a two-week extension of time from March 15, 2021 to March 29, 2021 to submit a joint letter concerning the status of settlement negotiation. This is the first request for an extension of time relating to the submission of the status letter.

The parties have taken steps towards settlement and the City is in receipt of a demand from plaintiff. However, the acquisition of documents and the settlement process have been delayed due to staffing and health related issues, resulting from the ongoing COVID-19 pandemic and working from remote locations.

The City has already begun internal deliberations and is confident that the additional two weeks will provide the time necessary to allow for the parties to fully flesh out the potential for early settlement. As a result, this would help to avoid the unnecessary expenditure of the Court's time and resources.

Accordingly, defendant City respectfully requests a two-week extension of time from March 15, 2021 to March 29, 2021 to submit a joint letter concerning the status of settlement negotiation.

Thank you for your consideration herein.

Respectfully submitted,

/s/

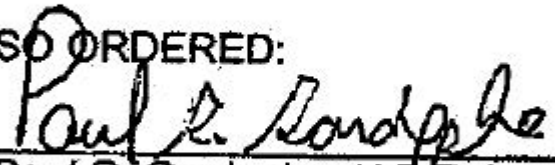
Joseph Zangrilli
Senior Counsel

CC: Alexis Padilla, Esq. (*Via ECF*)

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: March 11, 2021